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*Attorneys for Plaintiff*  
*Foremost Insurance Company,*  
*Grand Rapids, Michigan*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 FOREMOST INSURANCE COMPANY,  
 10 GRAND RAPIDS, MICHIGAN,

11 Plaintiff

12 vs.

13 MATTHEW DINOFIA; RHODA TO  
 14 RECOVERY, LLC d/b/a JOURNEY TO  
 RECOVERY; MICHELLI KALTSAS;  
 15 CHARLESTON RESIDENTIAL SERVICES,  
 LLC d/b/a CROSSROADS OF SOUTHERN  
 NEVADA; CARLENA BROWN, as Statutory  
 Heir and as Co-Administrator to the ESTATE  
 of GEORGE MITCHELL, JR.; GEORGE  
 MITCHELL, as Statutory Heir and as Co-  
 Administrator to the ESTATE of GEORGE  
 MITCHELL, JR., and DOES 1 -10,

16 Defendants

Case No.: 2:25-cv-00334-CDS-MDC

17 **JOINT STIPULATION AND  
 ORDER TO EXTEND BRIEFING  
 SCHEDULE RE: DEFENDANT  
 CHARLESTON RESIDENTIAL  
 SERVICES, LLC'S MOTION TO  
 DISMISS (ECF 25)  
[FIRST REQUEST]**

18 [ECF No. 28]

19  
 20 FOREMOST INSURANCE COMPANY, GRAND RAPIDS, MICHIGAN  
 21 (“Foremost”), and CHARLESTON RESIDENTIAL SERVICES, LLC d/b/a CROSSROADS OF  
 22 SOUTHERN NEVADA (“Charleston”) by and through their undersigned attorneys, hereby file  
 23 this Stipulation and [Proposed] Order to Extend the Briefing Schedule for Defendant  
 24 Charleston’s Motion to Dismiss (ECF No. 25).  
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 26

27 THE PARTIES HEREBY STIPULATE AND AGREE as follows:

28 1. Defendant Charleston filed its Motion to Dismiss (ECF No. 25) on May 30, 2025.

1           2. Pursuant to LR 7-2(b), and the Court's docket email, a response to Charleston's Motion  
 2 to Dismiss is due on June 13, 2025.

3           3. Counsel for the parties have communicated to discuss resolution of this matter, which  
 4 would eliminate the need for further briefing on Charleston's Motion to Dismiss, but are waiting  
 5 for client approval to determine how counsel may proceed to resolve this matter.

6           4. Pursuant to FRCP 6(b)(1), and LR 1A-61, the parties stipulate and request an extension  
 7 of 14 days from June 13, 2025 to June 27, 2025 for Foremost to file a response to Charleston's  
 8 Motion to Dismiss, and that, in turn, Charleston shall have an extension of 14 days after  
 9 Foremost's date to file, until July 11, 2025 to file a reply in support of the Motion.

10           5. This is the first request for an extension of time in this matter.

11           IT IS SO STIPULATED

13           DATED this 13<sup>th</sup> day of June, 2025.

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 15           */s/ Christian L. Moore, Esq.*  
 16           Christian L. Moore, Esq., SBN #3777  
 17           LAXALT LAW GROUP, LTD.  
 18           9790 Gateway Drive, Suite 200  
 19           Reno, NV, 89521  
 20           (775) 322-1170  
 21           *Attorneys for Plaintiff*  
 22           *Foremost Insurance Company,*  
 23           *Grand Rapids, Michigan*

21           DATED this 13<sup>th</sup> day of June, 2025.

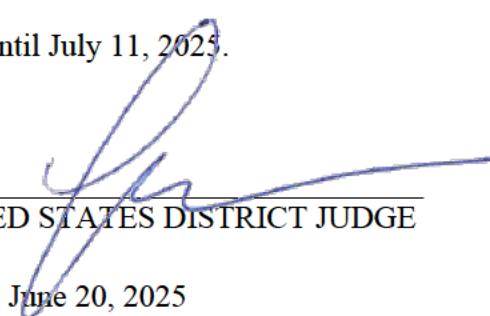
23  
 24           */s/ Lisa J. Zastrow, Esq.*  
 25           Lisa J. Zastrow, Esq., SBN#9727  
 26           GARIN LAW GROUP  
 27           9900 Convington Cross Drive, Suite 210  
 28           Las Vegas, Nevada 89144  
 29           (702) 382-1500  
 30           *Attorneys for Defendant Charleston*  
 31           *Residential Services, LLC d/b/a*  
 32           *Crossroads of Southern Nevada*

1 **ORDER**  
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3 IT IS HEREBY ORDERED that:  
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5 1. The time for FOREMOST INSURANCE COMPANY, GRAND RAPIDS,  
6 MICHIGAN to file a response to the motion to dismiss (ECF No. 25) is extended from June 13,  
7 2025 to June 27, 2025; and

8 2. The deadline for Charleston's reply in support of its motion to dismiss is  
9 extended fourteen days from Foremost's response, until July 11, 2025.  
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11   
12 UNITED STATES DISTRICT JUDGE  
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14 Dated: June 20, 2025  
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